UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

JUN 2 3 2005

**DATE:**

**SUBJECT:** TSCA PCB Inspection

Colorite Specialty Resins
35 Beverly Road
Burlington, NJ 08016

**FROM:** Leonard T. Pappalardo, Chemist
Toxics Section

Chester Norman, Chemist
Toxics Section

**TO:**

Daniel J. Kraft, Chief
Toxics Section

On June 8, 2005, a TSCA PCB Inspection was conducted at Colorite Specialty Resins (Colorite), Burlington, NJ. This was a follow-up inspection with regard to a NEIC Multimedia Inspection conducted at the same facility September 14 through 22, 2004. It was determined during the Multimedia Inspection that the facility has PCB Transformers some of which had shown to have PCB leakage.

No notification was given to the facility prior to the inspection. When we arrived, we met Messrs. Richard Fackler, Technical Director and Charles Cattell, Maintenance Manager. Official Credentials were presented and Notices of Inspection and Confidentiality were explained and signed by Mr. Fackler. This transpired prior to any discussion of the company's PCB activities, Attachment # 1. Colorite is a Division of Teckni-Plex, Inc. who bought the facility from Purtec-Ozite Corp. in 1998. The previous owner was Occidental Chemical Corporation who sold the facility to Purtec-Ozite in 1995. A TSCA PCB Inspection was conducted at Occidental Chemical Corporation on 3/25/1993, Attachment # 2. Teckni-Plex according to Dialog is in the wholesale trade business with annual sales exceeding 600 million dollars. They are located at 201 Industrial Parkway, Branchburg, NJ 08876. The CEO of Teckni-Plex, Inc. is Mr. Patrick Smith, Chairman. The CEO of the Colorite Division is Mr. David Axmann, General Manager. Annual Sales of this Division is 37 million dollars.

We learned the facility manufactures Polyvinyl Chloride Resins and Polyvinyl Chloride Poly Vinyl Acetate Copolymer Resins. In addition they manufacture some Poly Vinyl Chloride Poly Butyl Hydroxypropyl Acrylate Copolymer Resins. This is done in reactors through Suspension and Dispersion Polymerization process methods.

The Standard Industrial Code, SIC, of Colorite is 2821, Plastic Materials & Synthetic Resins, EPA ID No., NJD 001890185, D&B No., 928217025, and FRS No., 110000562230. The Parent D&B Number (Teckni-Plex, Inc.) is, 042023333 and SIC 5113, Industrial and Personal Service Paper.

In an inspection tour of the facility with Messrs. Cattell and Fackler we inspected oil filled

electrical equipment on site. We learned power is supplied by PSE&G at 26,400 volts through two General Electric, 3750 KVA substation transformers TP 1 and TP 2, Serial Numbers C 859698 and C 691628. The substation transformers reduce the power to 4160 volts. These were reclassified some years ago to non PCB Transformers. They each contain 875 gallons of 10c Oil. In addition, there are two General Electric "Oil Blast Circuit Breakers"in the substation each containing 265 gallons of non PCB oil, serial Nos. 0141A2702-201 and 0139A2285-201.

Outdoors in the Boiler House area we saw three General Electric, 750 KVA transformers US 1, 2 and 9, Serial Numbers 157979A, 157979B and 157979C. Each contains 165 gallons of 10c Oil. They reduce the power from the substation from 4160 to 480 Volts. According to Mr. Cattell these transformers replaced PCB Transformers at some earlier date.

The next outdoor site inspected was the PVC Electric Room Area. At this site there are three General Electric Transformers, US 5, 6 and 11, Serial Numbers E 694706B, E 694706A and E 687481B. US 5and 6 are 1000KVA and US 11, 1150 KVA. US 5 and 6 contain 165 gallons of "Pyranol" PCB Oil. US 11 contains 280 gallons of "Pyranol" (Identified from the Manufacturer's Name Plate). These transformers reduce the substation power from 4160 to 480 volts. The transformers have secondary containment and are $M_L$ Labeled. Photographs were taken of the transformers and the sampling valves of US 6 and US 11, see attached photographs. Mr. Cattell said that leaks generated by US 6 & 11 transformers occurred at the sampling valve. The sampling valves have a rag and plastic wrap covering them presumably to catch leaks of PCB Oil.

An attempt was made to take a wipe sample of the stained concrete pad underneath Transformer US 11. The stained area is underneath the sampling valve. This was not too successful as the hexane evaporated immediately from the hexane saturated wipe gauze. The ambient temperature was close to 100 degrees F. The transformer cooling fan was to the left of this stain which contributed to the rapid hexane evaporation. In view of this, the sample is not considered reliable and no analysis will be conducted for PCBs.

The last electrical site inspected was outdoors by the Copolymer Electric Room. At this site there are three General Electric Transformers, US 3, 4 and 8, Serial Numbers E 863473, E 687481A and F 964977. Each are 1000 KVA and contain 315, 280 and 180 gallons of "Pyranol" PCB oil, respectively. They also reduce the voltage from 4160 to 480 volts. The transformers have secondary containment and are $M_L$ Labeled. The containment and surrounding areas are contaminated with PVC dust to at least 0.5" thick. Some areas in the transformer containment area had mounds of dust at least several inches thick. There were no visible PCB Oil leaks around the transformers. A photograph was taken of these transformers.

At the office Mr. Fackler provided us with PCB Annual Documents Logs from 1999 through 2003, Attachment # 3. We asked for Current Transformer Inspection Records dating back to January 12, 2003. Mr. Cattell said that transformers are inspected biweekly for leaks. He also

said that the transformers are inspected by General Electric annually. The inspection records showed that leak events were recorded for Transformer US 11 on June 27, May 30, March 7, February 22, February 8 and January 11, 2004. Leak events were also recorded for transformer US 6 on August 22, and July 25, 2004, Attachment # 4. All these leaks amounted to small quantity drips. In addition oil stains were noted on Transformer Pads US 6 and 11 in the September 7, 2003 inspection record. We told Mr. Cattell that the leaks appeared to be a serious recurring problem. He said the valves were tightened to stop the leaks and oil stains were cleaned. Mr. Cattell indicated there were no records of clean-up. He would check work order logs and notify EPA if the information is found. We have not received any communication to date with regard to this. One PCB shipment (11/1/04) for disposal was documented on Bill of Lading, Number 62890. A 5 gallon drum of PCB solid debris, from the clean-up of the previously identified PCB Transformer leaks, was shipped for disposal to Spring Grove Resource Recovery, Cincinnati, OH, Attachment # 5. EPA Form 8700-22 was not used with this shipment. The out of service date for the PCB Waste and the unique identifying number of the container was not recorded on the Bill of Lading.

The facility failed to record all the necessary elements of PCB leak events from PCB Transformers US 6 and 11, as required by PCB Regulations. In particular, actions were not taken, during the time frame recorded to prevent further leaks. A minimal correction, simple tightening of the valve, was insufficient to prevent additional leaks; the dates of clean-up and repair are unrecorded and daily inspections for uncorrected leaks are unrecorded. Of particular concern, the valves on US 6 and 11 are covered with plastic wraps which are insufficient to contain additional leaks.

Mr. Fackler said they did not file a PCB Transformer Registration Form with EPA. We gave him a copy of Form 7720-12 and told him to file with EPA, HQ and to send us a copy of the completed form. Mr. Fackler also said they have no oil filled heat transfer systems. All reactors are heated with steam. In addition they have no large oil filled capacitors for power factor correction nor high temperature hydraulic systems.

The inspection was subsequently concluded and receipts for Samples Documents, Photographs and Confidential Business Information were signed by Mr. Fackler, Attachment # 6. No information was Declared Confidential.

Attachments:

1. Notices of Inspection and Confidentiality
2. Inspection Report, Dated, April 15, 1993, Occidental Chemical Corp.
3. PCB Annual Document Logs
4. Transformer Inspection Records
5. Bill of Lading, Number 62890
6. Receipts for Samples, Documents, Photographs and Confidential Business Information

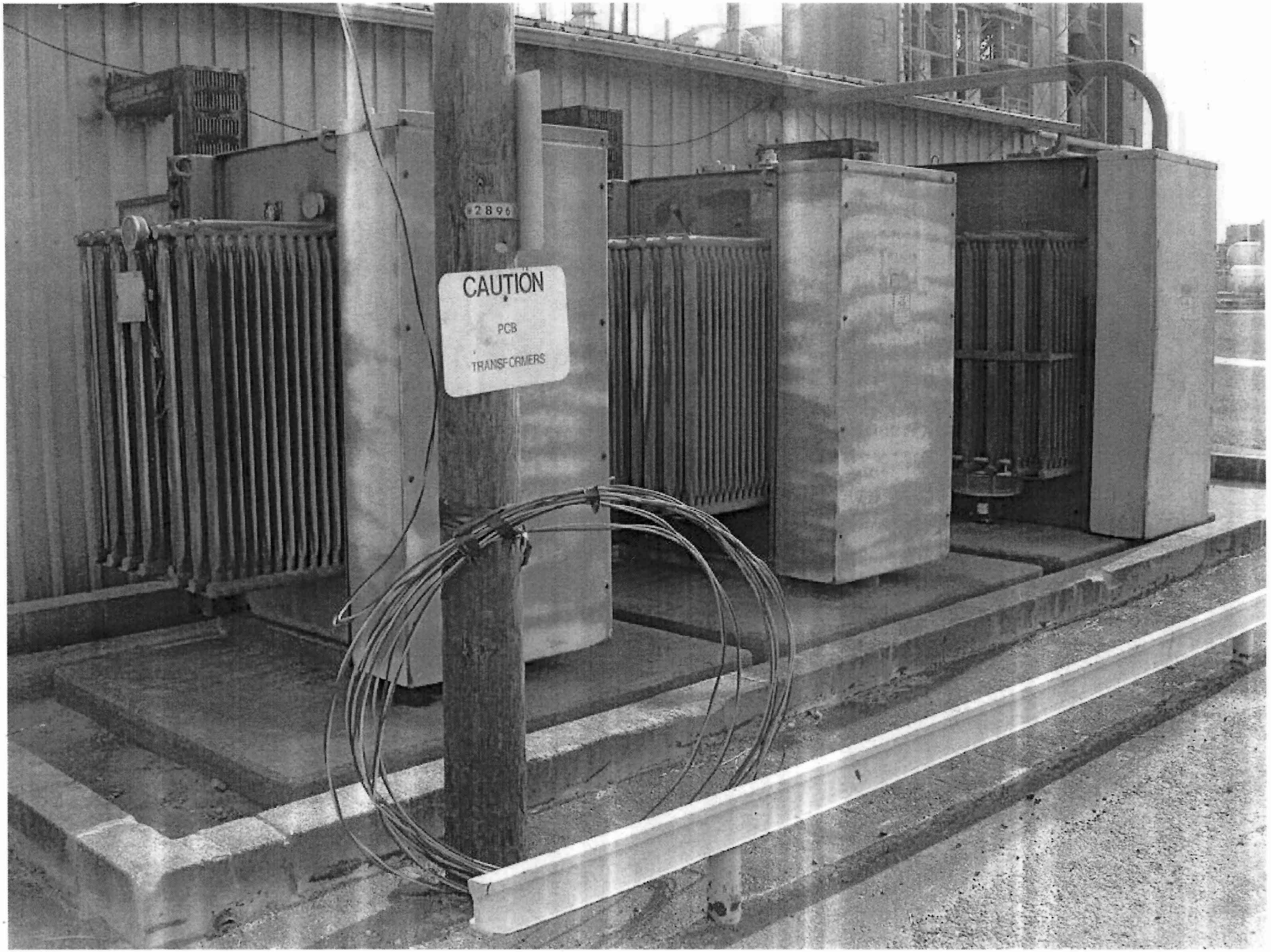
Table: Colorite PCB Transformers

Photographs: Colorite PCB Transformers

**Table**

**Colorite "Pyranol" PCB Transformers**

| Location | Make | S.N. | KVA | P/S | Fluid Type | Vol |
|---|---|---|---|---|---|---|
| PVC Elec. Room US5 | GE | E694706B | 1000 | 4160/480 | Pyranol | 165gal. |
| PVC Elec. Room US6 | GE | E694706A | 1000 | 4160/480 | Pyranol | 165gal. |
| PVC Elec. Room US11 | GE | E687481B | 1000 | 4160/480 | Pyranol | 280gal. |
| Copolymer Elec. Room US3 | GE | E863473 | 1000 | 4160/480 | Pyranol | 315gal. |
| Copolymer Elec. Room US4 | GE | E617481A | 1000 | 4160/480 | Pyranol | 280gal. |
| Copolymer Elec. Room US8 | GE | F964977 | 1000 | 4160/480 | Pyranol | 180gal. |


#2896
CAUTION
PCB
TRANSFORMERS

US-11 PCB
TRANSFORMER

# CAUTION
## CONTAINS
# PCBs
## (Polychlorinated Biphenyls)

A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761. For Disposal Information contact the nearest U.S. E.P.A. Office.

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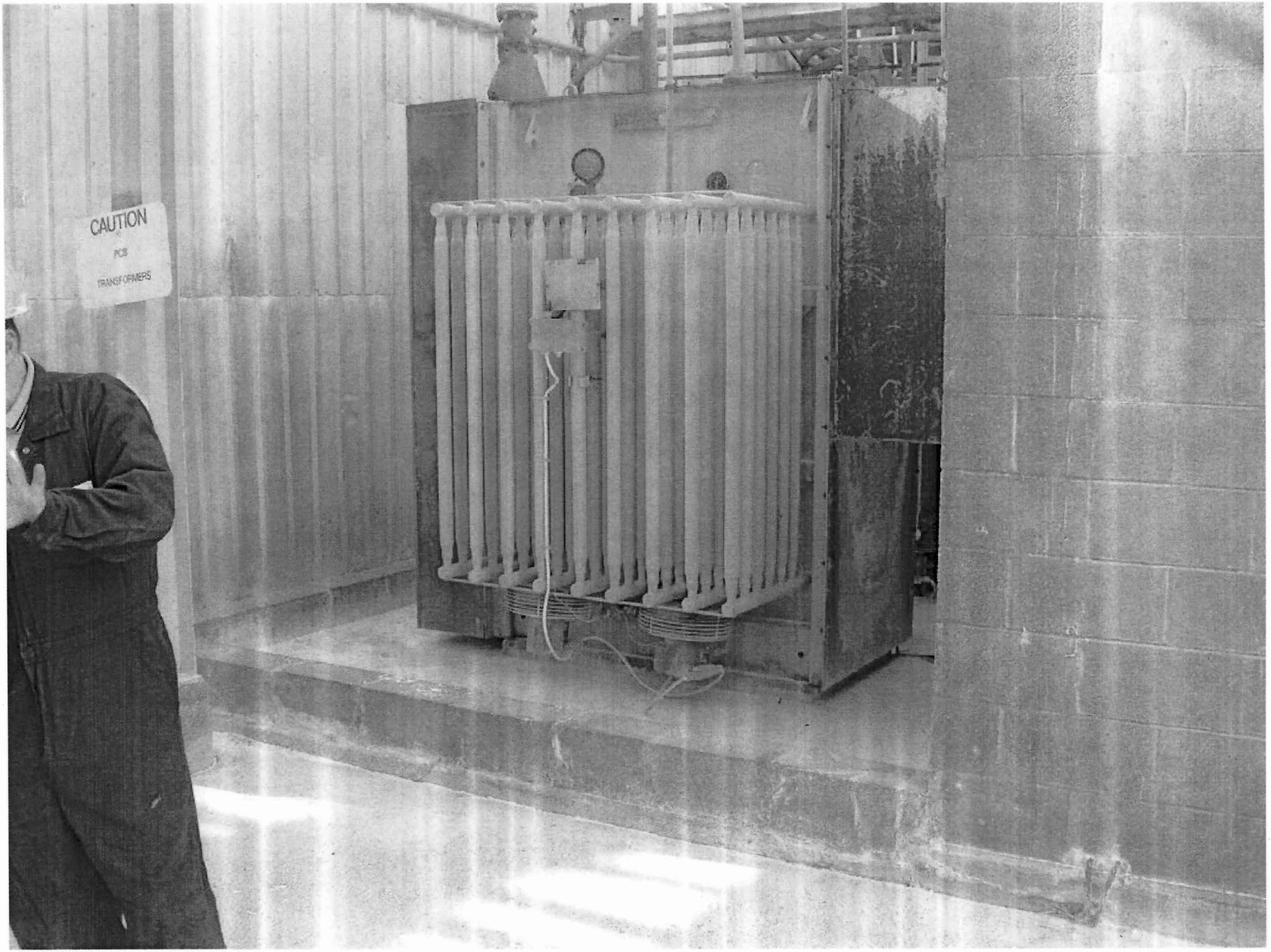
In case of accident or spill call toll free the U.S. Coast Guard National Response Center 800-424-8802.

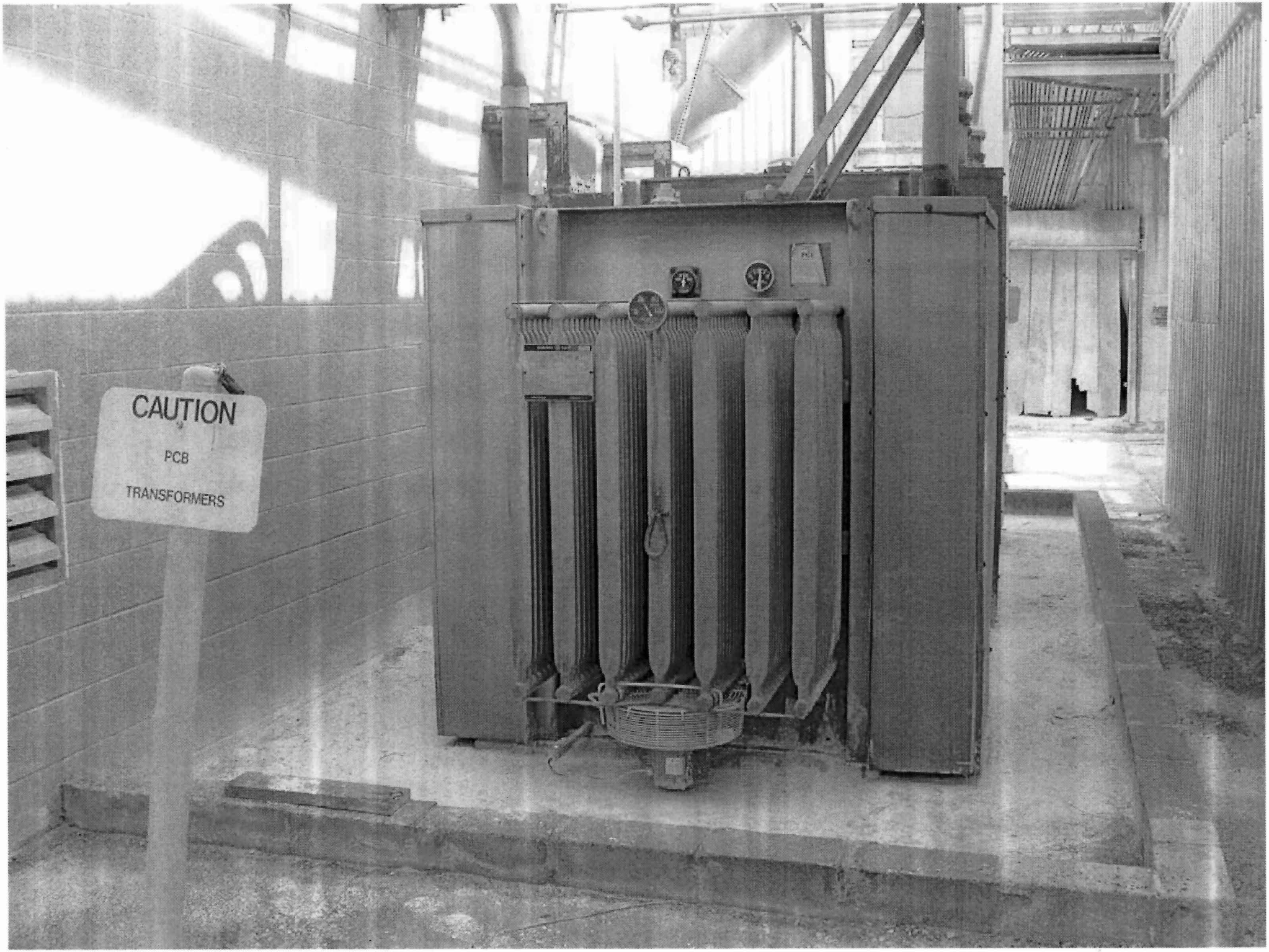
Also Contact Merle Cattell

Tel. No. 239 334 - 69671

PCB 6


CAUTION
PCB
TRANSFORMERS


COLD DM WATER
PCBs


CAUTION
PCB
TRANSFORMERS